

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

In re Application of FORENSIC NEWS LLC and
SCOTT STEDMAN for an Order Pursuant to 28
U.S.C. § 1782 to Conduct Discovery for Use in a
Foreign Proceeding

Case No. 22-mc-1617

[PROPOSED] ORDER

Upon consideration of the application submitted by Forensic News LLC and Scott Stedman (“Petitioners”) for an order pursuant to 28 U.S.C. § 1782 to conduct discovery for use in a foreign proceeding, and the accompanying memorandum of law, Declarations of Anne Champion, Patrick Doris, and Scott Stedman, and supporting documents,

IT IS HEREBY ORDERED that:

1. The application for discovery from Respondent Aviram Azari pursuant to 28 U.S.C. § 1782 is granted;
2. Leave of court is granted pursuant to Federal Rule of Civil Procedure 30(a)(2)(B) to depose Respondent Azari, who is confined in prison;
3. The Petitioners are authorized to take discovery relating to the issues identified in their application from Respondent Azari in accordance with the Federal Rules of Civil Procedure and the Rules of this Court, including by serving on Respondent Azari a subpoena duces tecum for a deposition and the production of documents listed in the form of the subpoenas attached as Exhibit 1 to the Declaration of Anne Champion;
4. Respondent Azari is hereby directed to comply with the subpoenas in accordance with the Federal Rules of Civil Procedure and the Rules of this Court;

5. Anne Champion of Gibson, Dunn & Crutcher LLP is hereby appointed to issue, sign, and serve the subpoenas upon Respondent Azari; and
6. This Court shall retain such jurisdiction as is necessary to effectuate the terms of such subpoenas.

Dated: _____, 2022

SO ORDERED

U.S.D.J.